

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

v.

**Crim. No. 18-CR-32-2 (DLF)**

**CONCORD MANAGEMENT AND  
CONSULTING LLC,**

**Defendant.**

**PARTIES' JOINT REQUEST FOR AN EXTENSION OF TIME TO SUBMIT  
PROPOSED MODIFIED PROTECTIVE ORDER**

Defendant Concord Management and Consulting, LLC (“Defendant” or “Concord”) and the United States (collectively, the “Parties”), by and through counsel, hereby jointly request leave of the Court for an extension until Friday, August 23, 2019, to submit their joint proposal for a Modified Protective Order. The Parties have made progress and reached consensus on many of the provisions of their proposed Modified Protective Order; however, a few of the logistical details regarding the procedures for transportation and storage of the newly classified “Intermediate Sensitive” discovery materials will require additional time to plan and discuss. Additionally, the Parties want to address the issues raised previously by the Court, in particular at the January 7, 2019 hearing, regarding the need for clarifications to the terms of the existing Protective Order, such as the mechanics of how the firewall counsel process will work, as well as other revisions that may be appropriate. The Parties discussed these revisions several months ago but believe additional time would be helpful to finalize those points. The Parties are striving to submit a proposal that will be acceptable to both Parties and the Court, and that will clearly spell out these

procedures to avoid any confusion in or disputes over the future implementation of the Modified Protective Order.

WHEREFORE, the parties ask for the Court's leave to file their joint proposal for a Modified Protective Order on or before August 23, 2019.

Respectfully submitted,

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Assistant Attorney General for National Security

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2019, I caused a copy of the foregoing motion to seal to be transmitted to Katherine Seikaly and Eric Dubelier, counsel of record for Concord Management and Consulting LLC, via email.

By: \_\_\_\_\_/s/  
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**ORDER**

Upon consideration of the Parties' Joint Request for an Extension of Time to Submit Proposed Modified Protective Order, it is hereby

ORDERED that the Parties joint motion is GRANTED, and the Parties shall file their joint proposal for a Modified Protective Order on or before August 23, 2019.

Date: August \_\_\_\_, 2019

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The Honorable Dabney L. Friedrich  
United States District Judge